

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

ORIGINAL

MM Docket No. 96-116

In the Matter of
HOMETOWN MEDIA, INC.

File No. BR-950601B9
DOCKET FILE COPY ORIGINAL

For Renewal of License
for Station WAYB(AM)
Waynesboro, VA

RECEIVED

JUL 11 1996

To: Administrative Law Judge Joseph Chachkin

MOTION FOR SUMMARY DECISION

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Hometown Media, Inc. ("Hometown"), by and through counsel and pursuant to Section 1.251 of the Commission's Rules, 47 C.F.R. §1.251, hereby submits this Motion for Summary Decision seeking summary resolution of the issues designated against Hometown in the Hearing Designation Order, DA 96-813, released May 22, 1996 ("HDO"). In support, the following is shown:

1. The following issues were designated against Hometown in the HDO:

1. To determine whether Hometown Media, Inc., has the capability and intent to expeditiously resume the broadcast operations of WAYB(AM), consistent with the Commission's Rules.
2. To determine whether Hometown Media, Inc., has violated Sections 73.1740 and 73.1750 of the Commission's Rules.
3. To determine, in light of the evidence adduced pursuant to the preceding issues, whether grant of the subject renewal of license applications would serve the public interest, convenience and necessity.

Each issue will be addressed seriatim.

STATION WAYB WILL BE RETURNED TO THE AIR EXPEDITIOUSLY

1. As demonstrated in the attached statements, WAYB will be returned to the air expeditiously. Hometown's President,

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Mr. Phillip C. Showers, states that he began negotiating with Brenda Merica and Randall Fields in August 1995 to assign the license to them after Station WAYB had gone off the air. These negotiations were delayed by several factors including a proposal by the local telephone company to purchase the tower. This was resolved when it was agreed that Mr. Fields will purchase the tower and lease space to the telephone company. Mr. Fields and Ms. Merica have entered into an agreement with Mr. Edwards, the major creditor of Hometown who actually owns the station's assets, to purchase the equipment to put the station back on the air. In addition, the City of Waynesboro has agreed to assign the tower lease to Mr. Fields and Ms. Merica and has pledged its assistance to them in returning the station to the air. See Statement of City Manager Schuyler M. Giles, attached. As Mr. Giles states:

As City Manager, speaking on behalf of the City and City Council, I respectfully urge the regulatory authority to grant the necessary approvals that will allow Mr. Randy Fields and Ms. Brenda Merica to reopen WAYB and begin broadcasting. Our city needs this hometown radio station, and I am convinced that our businesses, citizens, and their colleagues in the surrounding region will support the station as listeners and advertisers sufficiently to make it a success.

Finally, Mr. Fields and Ms. Merica are both local citizens and experienced broadcasters. They have made arrangements to hire employees, purchase equipment, and to prepare programming for the station. In addition, they have already invested almost a full year of time and in excess of Twelve Thousand Dollars (\$12,000) in acquiring the station and returning it to the

air. They have been through all of the hurdles and are now prepared to put the station back on the air within ninety days. Therefore, it should be concluded that the Station will be returned to the air expeditiously.

HOMETOWN'S VIOLATION OF SECTIONS 73.1740 and 73.1750
SHOULD NOT BE DISQUALIFYING

2. The Commission notes in the HDO that Station WAYB went off the air on March 17, 1995, and on August 8, 1995, requested special temporary authority to remain silent. This authority was granted on August 16, 1995, for a period of six months. Accordingly, it expired on February 16, 1996. See attached FCC letter granting the authority. Under the rules, the authority to remain silent should have been extended. Consequently, when this case was designated for hearing on May 22, 1996, the station had remained silent for approximately three months without authority. Mr. Showers admits that he violated the rules and sets forth the circumstances surrounding the violation. Thus, he explains why the station went silent originally and sets forth his initial intention to sell the station to Mr. Edwards and a group of local businessmen. Mr. Showers states that this intention was accurately stated in the renewal application filed in June 1995, but that the plan changed when Mr. Fields and Ms. Merica expressed an interest in acquiring the station in August 1995. Negotiations continued with them through the Fall of 1995 and the Spring of 1996. Mr. Showers states that, "I have no excuse for not seeking additional time except that I simply lost track of time. I was

still negotiating for the sale of the station throughout this period. In addition, I had to take another job to support my family and was distracted by other matters." Mr. Showers candidly admits he violated the rules, but sets forth the extenuating circumstances surrounding the rule violations. Under these circumstances and in light of Mr. Showers' intention to assign the station to Mr. Fields and Ms. Merica, these violations are not disqualifying and should not prevent a grant of WAYB's renewal application.

GRANT OF WAYB'S RENEWAL WILL SERVE THE PUBLIC INTEREST

3. A grant of WAYB's renewal will serve the public interest, convenience and necessity. As set forth in the City Manager's statement, the City of Waynesboro has a need for a local radio station and the city fully supports Mr. Fields and Ms. Merica in their efforts to return the station to the air. Mr. Fields and Ms. Merica are experienced broadcasters and local residents and have the capability and intent to return the station to the air. They have taken all steps necessary including entering into agreements to acquire the station's assets and obtaining the city's permission to use the tower site to put the station back on the air. They have already invested a great deal of time and money in the project and are committed to return the station to the air within ninety days. An application for Commission consent to assign the license has been prepared and is ready to be filed. Creditors of the current licensee will benefit since the proceeds of the sale will be used to pay off creditors. Finally, the admitted rule

violations of the current licensee are not serious enough to warrant denial of its renewal application. The licensee proceeded in good faith to finalize a sale of the station so that it could be returned to the air. Renewal of the license will permit the speedy resumption of service to the community and the assignment of the license to fully experienced and qualified local residents.

SUMMARY DECISION IS WARRANTED

4. The function of summary decision is to avoid a useless hearing. Summary Decision Procedures, 34 FCC 2d 485, 488 (1972). Section 1.251 of the Rules grants the Administrative Law Judge authority to grant a motion for summary decision where there is no genuine issue as to any material fact. 47 C.F.R. §1.251. Weyburn Broadcasting Limited Partnership, 6 FCC Rcd 1262, 1263 (Rev. Bd. 1991). Finally, the Commission has substantial discretion in acting on a motion for summary decision. The statutory hearing requirement "does not vouchsafe an inalienable right to cross-examination or surrebuttal." David Ortiz Radio Corporation v. FCC, 941 F.2d 1253, 1258 (D.C.Cir. 1991), quoting Cellular Mobile Sys. v. FCC, 782 F.2d 182, 197 (D.C.Cir. 1985). There is no genuine issue as to any material fact in this case and no useful purpose would be served by a hearing. The licensee has shown that, despite its admitted violation of the silence authority rules, a grant of its renewal conditioned on the speedy return of the station to the air and the assignment of the license to a qualified assignee will serve the public interest. In this


connection, the HDO contemplates that any grant be conditioned on the speedy resumption of operations. Thus at paragraph 4, the HDO reads:

4. IT IS FURTHER ORDERED, that, in the event it is determined that grant of the renewal of license application would serve the public interest, convenience and necessity, the grant will be conditioned on the expeditious resumption of operation, the precise period of time to be established in the hearing. Failure to resume operations within the time specified in the condition will result in the cancellation of the license and the deletion of the station's call letters.

As already shown, Mr. Fields and Ms. Merica are prepared to immediately file an assignment application and to resume operation of the station within ninety (90) days. A grant of the renewal application so conditioned will serve the public interest.

WHEREFORE, the premises considered, it is respectfully requested that the renewal application of WAYB be granted conditioned on the resumption of operations within ninety (90) days and the grant of the assignment of the license to Mr. Fields and Ms. Merica.

Respectfully submitted,
HOMETOWN MEDIA, INC..


By: /s/ William D. Silva
William D. Silva
Law Offices of Wm. D. Silva
5335 Wisconsin Ave., N.W.
Suite 400
Washington, D.C. 20015-2003
(202) 361-1711

July 11, 1996

STATEMENT OF PHILLIP C. SHOWERS

I Phillip C. Showers, hereby state under penalty of perjury as follows:

1. Station WAYB went on the air in 1947 and was the first station in the area. As a native of Waynesboro, I grew up listening to the station, which has always been noted for its service to the community. Having begun my radio career elsewhere, I returned to Waynesboro to work for the station in 1980 as Account Executive and left the station five years later as the Sales Manager.

2. WAYB went off the air in 1990 or 1991. It was my dream to return to my hometown, thus the name Hometown Media, Inc., and return WAYB to the air. We planned on reactivating the old tower and utilizing a studio nearby. However, in the interim, the studio building (which was co-located with the tower) had been leased by a day care center. Our plan to use the old tower site met with opposition in the community due to concerns for the exposure of the children to RF radiation. A complaint was filed with the FCC. In addition, the towers grandfathered zoning status was lost when the station went off the air. Accordingly, it was necessary not only to find a new studio site, but also a new tower site. We experienced a great deal of difficulty locating a new tower site. After exploring three or four different sites, the city of Waynesboro came to our aid and allowed us to locate the tower on city land. This shows the support we had for returning the station to the air. The final hurdle was finding

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and improving the studio site. We located the site at an outlet mall and made leasehold improvements totalling over One Hundred Thousand Dollars (\$100,000).

3. Finally, we were able to return WAYB to the air on September 1, 1994. However, the cost of locating a new tower site, building a new tower, locating a new studio site, and improving the studio building were all unanticipated and extensive. For example, the original bids on the leasehold improvements to the studio totalled Thirty Five Thousand Dollars (\$35,000). However, the final cost exceeded One Hundred Thousand Dollars (\$100,000). The delays in returning the station to the air were also unanticipated. These delays were also costly since we were without any operating revenues for an extended period of time. Finally, after experiencing six months of operating losses on top of all of the unanticipated expenses, I had no choice but to go silent on March 17, 1995.

4. In March 1995, before going silent, I filed a request for Special Temporary Authority to remain silent. Attached is a copy of the correspondence I received from the Commission relating to this request. Finally, the request was granted by letter dated August 16, 1995, for the station to remain silent "for six months from the date of this letter. See attached.

5. While this request was pending, I contacted Mr. Ken

-3-

Edwards, a civic-minded businessman who wanted to assist in putting the station back on the air and attempted to put a local group together for that purpose. Mr. Edwards obtained all of the assets of the station and some progress was made with this group. I mentioned the fact that I intended to assign the license to this group in my renewal application which was filed on June 1, 1995. Progress with this group was delayed somewhat with discussions as to whether to locate the studio at the outlet mall or downtown. This issue was of particular concern to members of the group who had businesses downtown

6. In August, I was contacted by Randy Fields who served as General Manager of Station WPKZ(FM), in Elkton, Virginia. Mr. Fields and Brenda Merica, one of the owners of Station WPKZ, indicated an interest in placing Station WAYB back on the air. The group of local businessmen headed by Mr. Edwards, having no broadcast experience, decided to step aside and assist Mr. Fields and Ms. Merica in their efforts. Negotiations began in earnest in September and continued throughout the Fall. At one point, CFW Telephone Company, the local telephone company, attempted to buy the radio tower. This delayed negotiations for a period, but it has been agreed that Mr. Fields will purchase the tower and lease space to the telephone company.

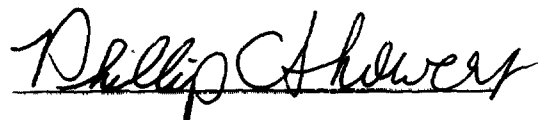
7. Negotiations between Mr. Fields and Mr. Edwards also continued throughout this period. These finally culminated in

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a purchase agreement which was signed in Waynesboro on May 24, 1996. At the time, none of the parties were aware of the Hearing Designation Order which was released May 22, 1996. The first time I learned of the Hearing Designation Order was when it was delivered to my home in the mail on Saturday, May 25, 1996.

8. Upon reading the Hearing Designation Order, I realized that the authority to remain silent expired on February 16, 1996. I have no excuse for not seeking additional time except that I simply lost track of the time. I was still negotiating for the sale of the station throughout this period. In addition, I had to take another job to support my family and was distracted by other matters.

9. I believe that Randy Fields and Brenda Merica have the capability and intent to expeditiously resume broadcasting. They have obtained the city's permission to lease the tower site and have taken steps to acquire all of the broadcasting equipment necessary to place the station back on the air. In addition, their broadcast experience in this area provides them with the ability to operate the station successfully and serve the public and the local community once again.



Phillip C. Showers

FCC MAIL SECTION

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20054

AUG 17 7 47 AM '95

AUG 16 1995

In Reply Refer To:
8910 - SML
Stop Code 1800B2

Phillip C. Showers, President
Hometown Media, Inc.
Route 2, Box 220
Forest, Virginia 24551

In re: WAYB(AM)
Waynesboro, Virginia

Dear Sir or Madame:

This letter concerns your pending request for authority to remain silent. Temporary authority is hereby granted for the above-referenced station(s) to remain silent for six months from the date of this letter.

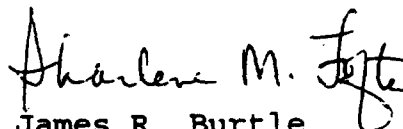
Any further requests for extension of this authority must be accompanied by a detailed summary of steps taken to return the station to on-air operations.

On December 11, 1991, the Commission adopted a Report and Order (copy attached) which amended Part 1 of the Commission's Rules, to implement Section 5301 of the Anti Drug Abuse Act of 1988. Pursuant to the Report and Order, any requests for extension of this authority must be accompanied by a certification that neither the applicant nor any party to the request is subject to a denial of Federal benefits under Section 5301. Please use the attached certification page to comply with this requirement, if you need to request an extension of this authority.

It will be necessary to maintain prescribed tower lighting in accordance with the station's license authorization. If an extension is not required, you are requested to notify the Commission, in writing, of the exact date the station resumes on-air operations.

In the event that any AM station remains silent for a period over 6 months, it will be necessary to file with the Commission, prior to returning the station to on-air operations, an FCC Form 302 for direct measurement of power which should include a partial proof of performance for stations with directional antennas.

Sincerely,



James R. Burtle
Chief, AM Branch
Audio Services Division
Mass Media Bureau

Attachments

8910-SML
WAYB(AM)

ANTI-DRUG ABUSE ACT CERTIFICATION

The applicant certifies that, in the case of an individual applicant, he or she is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862a, or, in the case of a non-individual applicant (e.g. corporation, partnership or other unincorporated association), no party to the application is subject to a denial of federal benefits pursuant to that section. For the definition of a "party" for these purposes, see 47 C.F.R. § 1.2002(b).

[] Yes

[] No

° Name of Applicant	° Signature	°
°	°	°
°	°	°
° Date	° Title	°
°	°	°
°	°	°

G MAIL SECTION

22 10 55 AM '95

1995 MAY 19

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

MAY 19 1995

IN REPLY REFER TO:
STOP CODE 1800B2
8910-SML

Phillip C. Showers, President
Hometown Media, Inc.
Route 2, Box 220
Forest, Virginia 24551

In re: WAYB (AM)
Waynesboro, Virginia

Dear Applicant:

This is in reference to your pending request for Special Temporary Authority (STA) for the above-referenced station to remain silent.

On December 11, 1991, the Commission adopted a Report and Order (see attached copy) to amend Part 1 of the Commission's Rules to implement Section 5301 of the Anti-Drug Abuse Act of 1988. Effective February 3, 1992, applicants requesting STA are required to certify that neither the applicant nor any party to the request is subject to a denial of Federal Benefits under Section 5301.

The Commission by letter of March 30, 1995 requested that you submit a certification of the ANTI-Drug Abuse Act of 1988. As of the date of this letter, the Commission has not received a response from you. Action will be deferred on your request pending receipt of your certification (See attached sample certification). Your certification should be directed to:

AM Branch, Room 342
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

Sincerely,

for *Sharon M. Fyfe*
James R. Burtle
Chief, AM Branch
Audio Services Division
Mass Media Bureau

Attachments

8910-SML
WAYB (AM)

ANTI-DRUG ABUSE ACT CERTIFICATION

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[] Yes

[] No

° Name of Applicant	° Signature	°
°	°	°
°	°	°
° Date	° Title	°
°	°	°
°	°	°

281
FCC MAIL SECTION

MAR 31 10 27 AM '95

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

MAR 30 1995

IN REPLY REFER TO:
STOP CODE 1800B2
8910-SML

Phillip C. Showers, President
Hometown Media, Inc.
Route 2, Box 220
Forest, Virginia 24551

In re: WAYB (AM)
Waynesboro, Virginia

Dear Applicant:

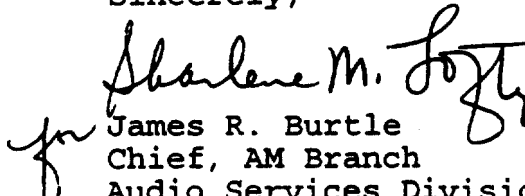
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Action will be deferred on your request pending receipt of your certification (See attached sample certification). Your certification should be directed to:

AM Branch, Room 342
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

Sincerely,


for James R. Burtle
Chief, AM Branch
Audio Services Division
Mass Media Bureau

Attachments

8910-SML
WAYB(AM)

ANTI-DRUG ABUSE ACT CERTIFICATION

The applicant certifies that, in the case of an individual applicant, he or she is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 853a, or, in the case of a non-individual applicant (e.g. corporation, partnership or other unincorporated association), no party to the application is subject to a denial of federal benefits pursuant to that section. For the definition of a "party" for these purposes, see 47 C.F.R. § 1.2002(b).

[] Yes

[] No

° Name of Applicant	° Signature	°
°	°	°
°	°	°
° Date	° Title	°
°	°	°
°	°	°

STATEMENT OF SCHUYLER M. GILES

I, Schuyler M. Giles, City Manager of the City of Waynesboro, Virginia, hereby state under penalty of perjury as follows:

1. I am currently City Manager of the City of Waynesboro, Virginia, and have been employed by the City in an official managerial capacity since 1974.

2. For most of these years the City of Waynesboro was served by two local radio stations, namely, (1) WAYB, which to my understanding was first put on the air in 1947, and (2) WANV, which was established just outside the city limits in or about 1965.

3. Neither of these radio stations presently serves Waynesboro from a local operating location. WAYB went out of business and off the air in 1990 or 1991 and was briefly returned to the air under new ownership in 1994 for a period of some six months. [WANV was acquired by other owners and no longer operates in its former location, which by annexation came into our city limits in 1986.]

4. As a result of these developments, the City of Waynesboro no longer has a local radio station, and it is my professional opinion that the citizens of Waynesboro and the city itself are the worse for this loss. There is no question but that the lack of such a local station has a continuing deleterious effect on the economic climate of our city and seriously erodes the sense of community

that we have long enjoyed in the nearly 200 years since our chartering as a town.

5. Local news coverage, which was once such a prominent feature of our local radio station(s), is now limited to our local newspaper and the more limited coverage we receive from area radio, television, and newspapers. It was very apparent, during the six months of WAYB's restoration to the air in 1994-95, that there was listener enthusiasm among our population for the type of hometown news and current events coverage, as well as sports and civic volunteer coverage, that can best be produced by a local radio station in its home base of operations.

6. Waynesboro, the City Council, and my office worked hard to cooperate with the then-owner of WAYB to help insure that the revived station would be a success. We diligently sought to help the station locate an appropriate site for its tower and leased the site to the owners on a long-term basis.

7. After our disappointment over Mr. Showers' inability to keep the station on the air, we were encouraged when it appeared that new owners might indeed be able to succeed where Mr. Showers had been unable to succeed. Accordingly, we were concerned when it appeared that the new owners might be unable to reopen WAYB because the permitted "authority to remain silent" granted to Mr. Showers had been allowed to expire.

8. As City Manager, speaking on behalf of the City and City Council, I respectfully urge the regulatory authority to grant the necessary approvals that will allow Mr. Randy Fields and Ms. Brenda Merica to reopen WAYB and begin broadcasting. Our city needs this hometown radio station, and I am convinced that our businesses, citizens, and their colleagues in the surrounding region will support the station as listeners and advertisers sufficiently to make it a success.

9. I am willing to provide any further information desired by any regulatory authority with regard to assisting Mr. Fields and Ms. Merica to return radio station WAYB to the air here in Waynesboro, Virginia, where it first broadcast nearly fifty years ago.

Witness my Signature and Seal this 3rd day of July, 1996, at Waynesboro, Virginia.


City Manager (SEAL)

STATE OF VIRGINIA, at large,

CITY OF WAYNESBORO, to-wit:

I, the undersigned Notary Public of and for the State of Virginia at large hereby certify that Schuyler M. Giles, known to me to be City Manager of Waynesboro, Virginia, this day appeared before me at Waynesboro, Virginia, and, being duly sworn, attested to the validity of the foregoing statement and thereto attested his signature and seal.

My commission expires November 30, 1999.


NOTARY PUBLIC

[Notarial Seal]

STATEMENT OF RANDALL FIELDS

I, Randall Fields, hereby state under penalty of perjury that:

1. I am currently General Manager of Station WPKZ (FM), Elkton, Virginia and have served in this capacity since August 1994. One of the owners of WPKZ is Brenda Merica, who is a long time resident and also serves as the Registrar for Page County, Virginia.

2. On approximately August 25, 1995, I contacted Phillip Showers about the possibility of purchasing Station WAYB (AM) in Waynesboro, Virginia and putting it back on the air. I was made aware of the fact that Mr. Ken Edwards of Waynesboro had legal ownership of all of the assets of the station and I contacted Mr. Edwards when he returned to the area sometime between September 10 and September 15, 1995. I also retained Richard Baugh, an attorney with the Harrisonburg law firm of Hoover, Penrod, Davenport & Crist to form a partnership for Ms. Merica and myself, to register this company with the SCC, and to prepare the documentation for the purchase of WAYB. During this same time, I also spoke with William D. Silva about the procedures for obtaining the FCC approval of such a sale and reserching the Commission files regarding the status of the license.

3. During the Fall of 1995, negotiations concerning the sale of of WAYB and its assets were conducted with the licensee and its major creditor, Mr. Edwards, and his attorney, Ron Denney, with the law firm of Franklin, Franklin, Denney & Ward. On January 17, 1996, a proposed purchase agreement was hand-delivered to the licensee, Mr. Edwards and Mr. Denney. I also contacted officials for the City of Waynesboro in regards to the assignment of the lease for the tower site of WAYB to our company.

4. In early February 1996, further negotiations with the licensee and the creditor over the terms and conditions of the purchase agreement took place, and the Downtown Redevelopment Authority of the City of Waynesboro, Virginia contacted us. They offered their assistance in helping to locate a studio site for the station and explained the benefits of locating in the Economic Development Zone, which provided some possible financing options. I began to look at possible studio sites and located the site most suited to the company's requirements. On February 28, 1996 I visited the site and met with the real estate agent listing the property to discuss its availability.


5. On March 6, 1996, I hand-delivered a revised purchase agreement to the licensee and the creditor and his attorney. I also contacted the Shenandoah Tower Service in Staunton, Virginia about contracting to complete the construction of the WAYB tower and for information on the cost of such work and scheduling details. Some further revisions were made to the purchase agreement and it was returned to Mr. Denney and other parties about March 22, 1996.

6. On April 26, 1996, I received further documentation on the status of the license from William Silva.

7. Final revisions to the purchase agreement were made and copies were delivered to all parties on May 15, 1996. The signing of this final agreement took place on May 24, 1996 at the law offices of Ron Denney in Waynesboro, Virginia. On May 29, 1996, I met with the City Manager and City Attorney of Waynesboro to request the transfer of the lease agreement from the licensee to Ms. Merica and myself. The city has agreed to reassign the lease and, as shown in the attached letter, supports our efforts to return Station WAYB (AM) to the air.

8. In addition to the actions reported above, Ms. Merica and myself have made arrangements to purchase equipment, to hire employees and to prepare programming for the station. The negotiations that preceded the execution of the purchase agreement took ten months and has incurred costs to us to date in excess of \$12,000 (Attorney fees - \$7,328.49; Escrow Money - \$5,000; Expenses @ \$950.00).

9. We have been attempting in good faith to acquire WAYB since August 1995 and we herein state that we are in a position to place the station back on the air within ninety days. As I have shown in this Statement, we have already invested a great deal of time and money in this venture and will provide the Commission with whatever assurance necessary that WAYB will be returned to the air expeditiously.

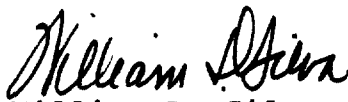

RANDALL FIELDS

7-2-96

Certificate of Service

I, William D. Silva, certify that on this 11th day of July, 1996, I have sent a copy of the foregoing MOTION FOR SUMMARY DECISION, via U.S. Mail postage prepaid to:

Robert Zauner, Esquire
Complaints and Political Programming Branch
Mass Media Bureau
Federal Communications Commission
2025 M Street, N.W.
Suite 7212
Washington, D.C. 20554


/s/ William D. Silva
William D. Silva